

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**BARKAN WIRELESS IP HOLDINGS,
L.P.,**

Plaintiff,

v.

**T-MOBILE US, INC., T-MOBILE USA,
INC., and NOKIA OF AMERICA
CORPORATION,**

Nokia.

**Civil Action No.
2:21-cv-00034-JRG**

**NOKIA’S MOTION FOR ISSUANCE OF LETTER REQUEST FOR DOCUMENT
PRODUCTION AND DEPOSITION TESTIMONY**

Nokia of America Corporation (“Nokia”) files this Motion of Issuance of Letter Request for Document Production and Deposition Testimony, and respectfully show as follows:

Nokia respectfully request that the Court issue the Letter Request attached hereto as Exhibit A, including its Attachments A, B, and C. The Letter Request asks the Israeli authorities to allow Nokia to receive documentary evidence and deposition testimony from Technion - Israel Institute of Technology (“Technion”) via the procedures set forth in the Hague Convention.

Technion possesses documents, policies, and information relating to ownership of the Asserted Patents. Further, Technion has the ability to identify one or more individuals having pertinent knowledge as to Technion’s Intellectual Property policies, as well as the coursework and activities of Dr. Elad Barkan while a student at Technion. For these reasons, Nokia anticipates utilizing the requested evidence at a minimum in defense of Plaintiff’s damages claim and in

furtherance of Nokia's ownership-based defenses. For these reasons, Nokia respectfully requests that the Court issue the Letter Request attached hereto as Exhibit A.

Dated: July 28, 2021

Respectfully submitted,

/s/John D. Haynes

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 28nd day of July, 2021.

/s/John D. Haynes
John D. Haynes